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March 17, 2021

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Workshops Regarding the Public Service Commission's Formal Review of Its Regulations Pursuant to S.C. Code Ann. Section 1-23-120(J)
S.C. Code Ann. Regs. 103-500 et seq., and 103-700, et seq.: Sewerage Utilities and Water Utilities
Docket No. 2020-247-A

Dear Ms. Boyd:

This letter is to inform the Public Service Commission of South Carolina ("Commission") that the South Carolina Office of Regulatory Staff ("ORS") has reviewed the comments filed by the South Carolina Department of Consumer Affairs ("DCA"), SouthWest Water Company ("SWWC"), and Blue Granite Water Company relating to the Commission's review of its water and sewer regulations. Based on ORS's review during the time available, ORS has not found the comments from other parties to be generally unreasonable. ORS offers the following brief specific responses to comments by the DCA and SWWC.

ORS continues to support the DCA's recommendations relating to rate case applications and minimum filing requirements. In particular, the requirement to file direct testimony with the rate application, enhanced filing requirements and a standardized rate case revenue requirement model would promote the ability of the Commission, ORS, and intervenors to review applications for rate increases more thoroughly. Parties will have an opportunity to provide further comments on this subject when the Commission releases its draft proposed minimum filing requirements for parties to review.

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ORS supports SWWC’s request to eliminate the requirement that written notices under Regulation 103-535.1 be provided by certified mail. ORS agrees with the reasons identified by SWWC in its comments and would also note that the expense of certified mail is a frequent source of customer complaint. However, ORS opposes SWWC’s recommendation to eliminate the requirement under Regulation 103-531.1 that the utility must give thirty (30) days written notice to the customer before service may be discontinued.

ORS appreciates the opportunity to further address these recommendations in the workshop scheduled for March 26th.

Sincerely,

s/ Alexander W. Knowles

Alexander W. Knowles

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)